

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

OLLIE GREENE, *et al.*,

Plaintiffs

v.

TOYOTA MOTOR CORPORATION, *et al.*,

Defendants.

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CAUSE NUMBER: 3:11-cv-0207-N

**TOYOTA DEFENDANTS' SUPPLEMENTAL OBJECTIONS TO PLAINTIFFS'
FIRST [SIC] AMENDED EXHIBIT LIST (DOC. NO. 705)**

TO THE HONORABLE COURT:

COMES NOW, Toyota Motor Corporation, Toyota Motor Engineering & Manufacturing North America, Inc., and Toyota Motor Sales, U.S.A., Inc. (collectively “the Toyota Defendants”) and file their Supplemental Objections to Plaintiffs' First [*sic*] Amended Exhibit List (Doc. No. 705) and would respectfully show the Court the following:

**I.
GENERAL OBJECTIONS**

When the Toyota Defendants filed its initial objections to Plaintiffs' First Amended Exhibit List (Doc. No. 702), the Toyota Defendants had not yet received Plaintiffs' trial exhibits. As Toyota stated in its initial objections, the Toyota Defendants were unable to ascertain the nature and contents of many of Plaintiffs' proffered exhibits based on the vague descriptions contained in Plaintiffs' exhibit list under they were produced on June 9, 2014. *See* Doc. No. 726. Upon receipt and review of Plaintiffs' trial exhibits, the Toyota Defendants determined that many of the exhibits listed below to not fairly and accurately depict the actual trial exhibits produced by Plaintiffs. Therefore, the Toyota Defendants assert these supplemental objections which are

noted in bold print throughout the list below.

Moreover, the Toyota Defendants note that Plaintiffs previously “intentionally omitted” certain exhibits from their exhibit list. However, when the Toyota Defendants received Plaintiffs’ trial exhibits, these exhibits were included. Accordingly, the Toyota Defendants assert objections to these exhibits in the list below where applicable. These objections are likewise listed in bold font. The Toyota Defendants do not waive their previous objections to Plaintiffs’ First Amended Exhibit List (Doc. No. 702) filed on June 4, 2014, and Plaintiffs’ First [sic] Amended Exhibit List (Doc. No. 705) filed on June 5, 2014, because they are untimely. The deadline for Plaintiffs to submit their exhibits list was May 23, 2014.

Moreover, the Toyota Defendants object to all of Plaintiffs’ exhibits which consist of data and file materials considered, prepared or relied upon by Plaintiffs’ expert witnesses in forming their opinions in this case. The Toyota Defendants have filed motions with this Court seeking to exclude the untimely-disclosed materials.¹ As these motions indicate, the Toyota Defendants propounded discovery to Plaintiffs requesting the production of the complete file of all testifying experts. Plaintiffs not only failed to produce these materials in response to the Toyota Defendants’ request for production, but also failed to timely produce these materials as part of Plaintiffs’ expert disclosures under Rule 26(a)(2)(B). Accordingly, Plaintiffs are precluded from use of their untimely disclosed expert materials at trial. Fed. R. Civ. P. 37(c)(1). The Toyota Defendants have objected to these exhibits, and other exhibits that were not timely disclosed, to the extent that they are identifiable in the exhibit list below by noting an objection based on “Fed. R. Civ. P. 26(a)(2).”

¹ See Toyota Defendants’ Motion to Exclude Untimely Disclosed File Materials and Data of Plaintiffs’ Expert Jeff G. Vick and Brief in Support Thereof (Doc. Nos. 377, 378); Toyota Defendants’ Motion to Exclude (Doc. No. 825, 826).

II.
TOYOTA DEFENDANTS' SUPPLEMENTAL OBJECTIONS TO
PLAINTIFFS' FIRST [SIC] AMENDED EXHIBIT LIST

Subject to the general objections stated above, the Toyota Defendants hereby make, serve and file their supplemental objections, together with the grounds therefore, to the Plaintiffs' exhibit list:

Plaintiffs' Exhibit		The Toyota Defendants' Objection
1.	Photo of Lakeysha Greene laying in the roadway	Fed. R. Evid. 401, 402, 403
2.	Photo of Toyota SUV burning at accident site	
3.	Kaufman County Records Affidavit of 9-1-1 calls	
4.	Photo of Greene child charred remains	Fed. R. Evid. 401, 402, 403
5.	Photo2 of Greene child charred remains	Fed. R. Evid. 401, 402, 403
6.	Photo of wreckage and blood on roadway	Fed. R. Evid. 401, 402, 403
7.	Photo of charred remains being removed from Toyota 4Runner	Fed. R. Evid. 401, 402, 403
8.	Photo of rear of Toyota 4Runner at accident site	
9.	Photo of side of Toyota 4Runner at accident site	
10.	Photo of rear of Dolphin-Strick trailer at accident site	
11.	Photo of ICC Rear Impact Guard laying in roadway	
12.	Photo2 of ICC Rear Impact Guard laying in roadway	
13.	Intentionally Omitted	
14.	Photo of mud-flap on Dolphin Trailer at accident site	
15.	Close-up of photo2 of mud-flap on Dolphin Trailer at accident site	
16.	Photo of the Volvo tractor's front grill at accident site	
17.	Photo of front of Volvo truck at accident site	

Plaintiffs' Exhibit		The Toyota Defendants' Objection
18.	Intentionally Omitted	
19.	Intentionally Omitted "Deposition Notice for John Fayard Moving and Storage"	Fed. R. Evid. 401, 402, 403, 801, 802
20.	Intentionally Omitted	
21.	Invoice for Repair of ICC bar by Gulf City Body and Trailer Works, Inc.	
22.	Quotation for Repair of ICC bar by Gulf City Body and Trailer Works, Inc.	
23.	Photo of rear of Strick Trailer after repair by Gulf City Body and Trailer Works, Inc.	
24.	Intentionally Omitted	
25.	Intentionally Omitted	
26.	Accident Report dated June 1, 2010, from Daniel Sprinkle of May 28, 2010, accident	Fed. R. Evid. 801, 802
27.	Photos of rear of Strick trailer after accident - taken by John Fayard Moving	
28.	Fayard's Net Worth [CONFIDENTIAL]	Fed. R. Evid. 401, 402, 403
29.	April 6, 2010 Dolphin Repair Order "Deposition Notice for Dolphin Lines"	Fed. R. Evid. 401, 402, 403, 801, 802
30.	List of Trailers owned by Dolphin	
31.	Exemplar of Dolphin Broker Carrier Agreement, such as the one with Fayard Moving and Warehouse	
32.	Delivery receipt from RC Trailers for delivery of Strick Trailers to Dolphin	
33.	Financial statements of Dolphin Line Inc. [CONFIDENTIAL]	Fed. R. Evid. 401, 402, 403
34.	July 10, 2007 Dolphin Repair Order	
35.	February 29, 2008 Dolphin Repair Order	
36.	July 2, 2008 Dolphin Repair Order	
37.	April 6, 2010 Dolphin Repair Order	
38.	Intentionally Omitted "Deposition Notice for Strick Trailers LLC"	Fed. R. Evid. 401, 402, 403, 801, 802
39.	Email from Todd Parks with deposition subjects for Strick designees and notification of	Fed. R. Evid. 401, 402, 403, 801, 802

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	production of exemplar trailer	
40.	Strick Invoice dated February 10, 2003 withers Trailers	
41.	Strick Invoice with RC Trailers, signed by all	
42.	Strick Sales Order Specifications for RC Trailers Order	
43.	Press Release from Insurance Institute for Highway Safety – <i>Underride guards on big rigs fail in crashes; Institute petitions government for new standard</i>	Fed. R. Evid. 401, 402, 403, 801, 802, 901
44.	Letter to NHTSA from Insurance Institute for Highway Safety re: petitioning the government for new standard for underride guards	Fed. R. Evid. 401, 402, 403, 801, 802, 901
45.	<i>Underride Crashes</i> : Status Report from Insurance Institute for Highway Safety	Fed. R. Evid. 401, 402, 403, 801, 802, 901
46.	April 14, 1993, memo from NHTSA regarding Rear Impact guards	
47.	Email among Strick officers regarding the Torcominian Patent's Underride Guard	
48.	Strick Trailer Care and Maintenance Manual	
49.	Strick Trailer Care and Maintenance Manual - Updated Dec 2011	
50.	Strick's Manufacturer's Certification Label	
51.	Strick flyer – acknowledging that aftermarket and parts distributor is New Life Transport Parts Center	
52.	Strick's Dealers Names and Locations	
53.	Strick's Parts Nomenclature from New Life Transport Center	
54.	ICC Complete Assembly Orders	
55.	Strick Letter dated June 19, 1998 to customers to retrofit guards to new standards	
56.	Cost Bill of Materials for Rear of Strick Trailer	
57.	Photo1 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards	

Plaintiffs' Exhibit	The Toyota Defendants' Objection
58. Photo2 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards	
59. Photo3 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards	
60. Strick diagram showing an ICC guard with rounded end	
61. Canadian Motor Vehicle 223 Standards effective 2005	
62. List of Underride cases in which Strick has been involved	
63. Strick Record Retention Policy	
64. April 6, 2012 Supplemental Discovery Request to Strick	
65. Strick Balance Sheet [CONFIDENTIAL]	Fed. R. Evid. 401, 402, 403
66. Canadian Motor Vehicle 223 Test Methods dated 2003	
67. Strick 1995 Rear Impact Guard Testing Report	
68. Karco Testing Report for Strick Trailers submitted to NHTSA 1999	
69. Texas Peace Officer's Report prepared by Trooper Barkley	Fed. R. Evid. 401, 402, 403, 801, 802 (subject to redaction)
70. Excerpt from Texas Peace Officer's Report prepared by Trooper Clint Baughman	Fed. R. Evid. 401, 402, 403, 801, 802 (subject to redaction)
71. Excerpt2 from Texas Peace Officer's Report prepared by Trooper Clint Baughman	Fed. R. Evid. 401, 402, 403, 801, 802 (subject to redaction)
72. Annual Vehicle Inspection Report for Dolphin Tractor	
73. Crash Investigation Report from Texas Peace Officer's Report prepared by Trooper Clint Baughman regarding John Fayard Moving & Storage	Fed. R. Evid. 401, 402, 403, 801, 802 (subject to redaction)
74. Supplemental Investigation report with information obtained from Trooper Barclay	Fed. R. Evid. 401, 402, 403, 801, 802 (subject to redaction)
75. Intentionally Omitted "Notice of Deposition of Volvo Corporate Representative"	Fed. R. Evid. 401, 402, 403, 801, 802
76. Intentionally Omitted	

Plaintiffs' Exhibit		The Toyota Defendants' Objection
77.	Intentionally Omitted	
78.	IIHS Status Report dated April 17, 2008 re: Crash Avoidance Technologies	Fed. R. Evid. 401, 402, 403, 801, 802 (subject to redaction)
79.	Intentionally Omitted	
80.	Intentionally Omitted	
81.	Intentionally Omitted	
82.	National Transportation Safety Board Special Investigative Report - Prevention of Rear end collisions	Fed. R. Evid. 401, 402, 403, 801, 802 (subject to redaction)
83.	National Transportation Safety Board's Most Wanted List - Mandate Motor Vehicle Collision Avoidance Technologies	Fed. R. Evid. 401, 402, 403, 801, 802 (subject to redaction)
84.	National Transportation Safety Board's investigation of Truck-Tractor Semitrailer Rear-end Collision into Passenger Vehicles on Interstate 44 Near Miami, Oklahoma June 26,2009	Fed. R. Evid. 401, 402, 403, 801, 802 (subject to redaction)
85.	Intentionally Omitted	
86.	Intentionally Omitted	
87.	Intentionally Omitted	
88.	Intentionally Omitted	
89.	Intentionally Omitted	
90.	Intentionally Omitted	
91.	Intentionally Omitted	
92.	Intentionally Omitted	
93.	NHTSA's Vehicle Compatibility Research Program	Fed. R. Evid. 401, 402, 403, 801, 802 (subject to redaction)
94.	Intentionally Omitted	
95.	Intentionally Omitted	
96.	Intentionally Omitted	
97.	Intentionally Omitted	
98.	Intentionally Omitted	
99.	Intentionally Omitted	
100.	Intentionally Omitted	
101.	Intentionally Omitted	
102.	Intentionally Omitted	
103.	Intentionally Omitted	
104.	Intentionally Omitted	
105.	Photo of Volvo truck at accident site(passenger side view)	
106.	Photo of Volvo truck at accident site (front end view)	

Plaintiffs' Exhibit		The Toyota Defendants' Objection
107.	Photo of Volvo truck at accident site (showing front end and grill)	
108.	Intentionally Omitted	
109.	Intentionally Omitted	
110.	Intentionally Omitted	
111.	Intentionally Omitted	
112.	Photo of remaining parts of Volvo tractor bumper taken at inspection	
113.	Intentionally Omitted	
114.	Intentionally Omitted	
115.	Intentionally Omitted	
116.	Intentionally Omitted	
117.	Article - <i>First Order Analysis for Automotive Body Structure Design</i>	Fed. R. Evid. 401, 402, 801, 802
118.	Article - <i>Application of Crash Simulation to Vehicle Development</i>	Fed. R. Evid. 401, 402, 801, 802
119.	Passive Safety - Toyota's use of CAE and FEM	Fed. R. Evid. 401, 402, 403, 801, 802
120.	Document Retention Policy for Toyota Motor Corporation	Fed. R. Evid. 401, 402, 403
121.	<i>The Study of the Frontal Compatibility of Consideration of Interaction and Stiffness</i>	Fed. R. Evid. 401, 402, 403, 801, 802
122.	THUMS Total Human Model for Safety article	Fed. R. Evid. 401, 402, 403
123.	THUMS Total Human Model for Safety 2011 article	Fed. R. Evid. 401, 402, 403
124.	Simulation of Occupant Motion in Rear Impacts using Human FE Model THUMS	Fed. R. Evid. 401, 402, 403
125.	Intentionally Omitted	
126.	Letter dated March 4, 1992 from Saburo Inui to NHTSA discussing FMVSS 210 and manufacturer's freedom on designs	Fed. R. Evid. 401, 402, 403
127.	Photograph of undercarriage of 2010 Toyota 4Runner prepared for NCAP testing	
128.	Photo of undercarriage of Toyota 4Runner Trail model (from Toyota Brochure)	Fed. R. Evid. 401, 402, 403
129.	Narrative of Fuel System from Toyota 4Runner Brochure	Fed. R. Evid. 401, 402, 403
130.	Narrative and diagram of Fuel Tank	Fed. R. Evid. 401, 402, 403

	Plaintiffs' Exhibit	The Toyota Defendants' Objection
	components (from Toyota 4Runner Brochure)	
131.	Letter dated March 5, 1993 from Saburo Inui to NHTSA discussing FMVSS 301 and standards for testing tanks	Fed. R. Evid. 401, 402, 403
132.	Narrative and diagram of SRS airbags (from 2010 Toyota Brochure)	Fed. R. Evid. 401, 402, 403
133.	Toyota press release of recall of RAV4 and Highlander vehicles to replace curtain shield airbag sensor assembly	Fed. R. Evid. 401, 402, 403, 404
134.	Toyota press release of recall of 2011 RAV4 vehicles to replace curtain shield airbag initiator assembly	Fed. R. Evid. 401, 402, 403, 404
135.	Picture showing the burning Toyota 4Runner	
136.	Intentionally Omitted “Deposition Notice of Toyota Motor Sales”	Fed. R. Evid. 401, 402, 403, 801, 802
137.	Toyota Motor Sales' Document Retention Policy	Fed. R. Evid. 401, 402, 403
138.	Toyota 4Runner Ad (<i>No Intelligent Life Out There</i>)	Fed. R. Evid. 401, 402, 403
139.	Toyota 4Runner ad (<i>Rise Above Ordinary</i>)	Fed. R. Evid. 401, 402, 403
140.	Website advertising of Toyota 4Runner	Fed. R. Evid. 401, 402, 403, 801, 802, 901
141.	September 24, 2009, Press Release announcing launch of 2010 4Runner	Fed. R. Evid. 401, 402, 403
142.	Internet article of Press Release regarding debut of Toyota 4Runner in Dallas	Fed. R. Evid. 401, 402, 403, 801, 802, 901
143.	Sales brochure for 2011 4Runner	Fed. R. Evid. 401, 402, 403
144.	Sales brochure for 2010 4Runner	Fed. R. Evid. 401, 402, 403
145.	Toyota Pocket Source Brochure for 2010 4Runner	
146.	Intentionally Omitted “Copy of backside of SUV comparison card”	Fed. R. Evid. 401, 402
147.	Copy of Toyota advertisement (spending a million dollars per hour)	Fed. R. Evid. 401, 402, 403
148.	Toyota 4Runner ad (Star Safety)	Fed. R. Evid. 401, 402, 403
149.	Toyota 2010 Organizational Chart	Fed. R. Evid. 401, 402, 403
150.	Toyota Press Release of recall of selected Lexus models	Fed. R. Evid. 401, 402, 403, 404
151.	Toyota Press Release of recall of	Fed. R. Evid. 401, 402, 403, 404

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	4Runners and other vehicle in Southeast Region for Seat Occupant Sensing System	
152.	Toyota Press Release of recall of certain vehicles for passenger airbag inflator problems	Fed. R. Evid. 401, 402, 403, 404
153.	Manufacturers Motor Vehicle Specifications for 2010 4Runner	
154.	Toyota 4Runner Owners Warranty Rights Notification	
155.	Main Vehicle Inquiry showing logistics and building of the Greene 4Runner	
156.	Service Serial Master Inquiry for Greene 4Runner	
157.	Texas Dept. of Motor Vehicle history for the Greene 4Runner	
158.	Monroney Label (Sticker Label) for Greene 4Runner	
159.	Toyota Organizational Chart for 2013	Fed. R. Evid. 401, 402, 403
160.	Mills Accident Report	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
161.	Diab Accident Report	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
162.	Baker Accident Report	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
163.	Puga Accident Report	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
164.	Schiller Accident Report	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
165.	Snelgrove Accident Report	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
166.	Photo of accident site (Exhibit 1 from Brian Thompson Deposition)	
167.	Recall letter from NHTSA dated June 25, 2010 of 2010 Lexus HS for noncompliance with FMVSS 301	Fed. R. Evid. 401, 402, 403, 404
168.	Toyota's July 27, 2010 letter to NHTSA responding to recall notice re 2010 Lexus HS for noncompliance with FMVSS 301	Fed. R. Evid. 401, 402, 403, 404
169.	Scale diagram of accident scene received from Texas Highway Patrol Division	
170.	Information regarding Stop-Sale Order on Toyota Automobiles from U.S., Canada over Flammable Seat Fabric	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
171.	Intentionally Omitted	
172.	Intentionally Omitted	
173.	Intentionally Omitted	

Plaintiffs' Exhibit	The Toyota Defendants' Objection
174. NHTSA Publication - Traffic Safety Facts 2006 Data (bates no. GREENE_006711-15)	Fed. R. Evid. 401, 402, 403, 801, 802
175. Toyota Press Release confirming more than 2.2 million vehicles sold in U.S. in 2008.	Fed. R. Evid. 401, 402, 403
176. Announcement: Toyota Launches New Product Leadership Campaign with its agency Saatchi & Saatchi.	Fed. R. Evid. 401, 402, 403, 801, 802, 901
177. Ad with mom holding a baby - No matter who you are or what you drive, everyone deserves to be safe	Fed. R. Evid. 401, 402, 403, 801, 802, 901
178. Ad from front page of Yahoo, shown nationwide, depicting a woman holding a baby and figures of a family of four and the slogan "Everyone deserves safety."	Fed. R. Evid. 401, 402, 403, 801, 802, 901
179. Ad depicting minorities standing behind Toyota's "everyone deserves to be safe" claim.	Fed. R. Evid. 401, 402, 403, 801, 802, 901
180. National ad portraying actor (or employee) who is represented to be a female Automotive Engineer with Toyota.	Fed. R. Evid. 401, 402, 403
181. National ad portraying actor (or employee) who is represented to be a minority male Automotive Engineer at Toyota.	Fed. R. Evid. 401, 402, 403
182. National ad portraying actor (or employee) who is represented to be the Chief Engineer at Toyota.	Fed. R. Evid. 401, 402, 403
183. National ad alleging that Toyota has set up "Smart Teams," comprising "200 highly trained engineers and technical experts.	Fed. R. Evid. 401, 402, 403
184. National ad alleging that Toyota has set up "Smart Teams," includes an endorsement from Toyota's "Chief Quality Officer,"	Fed. R. Evid. 401, 402, 403
185. Toyota T.V. ad depicting a couple, and announcing that Toyota is recognized for being safe.	Fed. R. Evid. 401, 402, 403, 801, 802, 901
186. Toyota T.V. ad depicting small children, and announcing that Toyota is recognized for being safe.	Fed. R. Evid. 401, 402, 403, 801, 802, 901

Plaintiffs' Exhibit	The Toyota Defendants' Objection
187. Toyota T.V. ad depicting a family of four, and announcing that Toyota is recognized for being safe.	Fed. R. Evid. 401, 402, 403, 801, 802, 901
188. Toyota T.V. ad depicting an African-American family with kids, and announcing that Toyota is recognized for being safe.	Fed. R. Evid. 401, 402, 403, 801, 802, 901
189. Toyota T.V. ad with a tagline announcing that Toyota is recognized for being safe.	Fed. R. Evid. 401, 402, 403, 801, 802, 901
190. Toyota T.V. ad with a tagline announcing that "no other brand has won more (safety awards)."	Fed. R. Evid. 401, 402, 403, 801, 802, 901
191. National ad - spending \$1 million an hour on safety is displayed prominently on the commercial.	Fed. R. Evid. 401, 402, 403, 801, 802, 901
192. Rollover Ratings for Midsize SUV's prepared by Insurance Institute for Highway Safety, Highway Loss Data Institute.	
193. February 24, 2010, testimony of Toyota's CEO, Akio Toyoda, before the U.S. House Committee on Oversight and Government Reform.	Fed. R. Evid. 401, 402, 403, 404
194. February 9, 2010 Op-Ed in the Washington Post written by Toyota's CEO, Akio Toyoda.	Fed. R. Evid. 401, 402, 403, 404
195. Press Release: Toyota paid \$1.6 billion to settle claims related to certain recalls.	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
196. Press release: Toyota paid a record \$16.4 million fine to the U.S. government for failing to quickly report safety problems.	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
197. Toyota recall in 2010 of thousands of the 2010 Lexus HS 250h due to deadly fuel leaks after collisions	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
198. Toyota recall of the Lexus GS, IS 250 and IS350 models in the United States due to potential cracks in fuel pipes.	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
199. Toyota recall of 2009-2012 4Runners, Sequoias, and other vehicles because Toyota failed to test the passenger seat occupant sensing system calibration.	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
200. Toyota recall of hundreds of thousands	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901

	Plaintiffs' Exhibit	The Toyota Defendants' Objection
	of RAV4 and Highlander SUVs due to defective curtain shield airbags.	
201.	Toyota recall of more RAV4 and Highlander SUV models for defective side curtain shield airbags.	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
202.	Toyota recalls Corolla, Sequoia, Tundra vehicles for defective airbag inflators.	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
203.	Toyota press releases confirming that Toyota has had over thirty-five (35) recalls over the last 2-3 years on all of its models for various safety issues.	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
204.	Toyota ad depicting that the 4Runner is used off-road.	Fed. R. Evid. 401, 402, 403, 801, 802, 901
205.	Toyota ad depicting the 4Runner being used for racing.	Fed. R. Evid. 401, 402, 403, 801, 802, 901
206.	Toyota ad - 4Runner has maximum ground clearance.	Fed. R. Evid. 401, 402, 403, 801, 802, 901
207.	Toyota ad of the undercarriage of 2010 Toyota 4Runner 4x4 version - bates SSTSUB13-00166	Fed. R. Evid. 401, 402, 403, 801, 802, 901
208.	Toyota d stating that the 4Runner can "take on any road to anywhere."	Fed. R. Evid. 401, 402, 403, 801, 802, 901
209.	Toyota advertised the 4Runner as "one of the most trustworthy vehicles on the road."	Fed. R. Evid. 401, 402, 403, 801, 802, 901
210.	2010 article noting that Toyota's safety campaign was being blitzed all over the country on virtually every network.	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
211.	Advertisement for Toyota 4Runner - "take daily nonstop to the middle of nowhere...then return home to tell us about it thanks to the Star Safety System."	Fed. R. Evid. 401, 402, 403, 801, 802, 901
212.	Official Justice Department Press Release Announcing Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
213.	Official Justice Department Deferred Prosecution Agreement regarding Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with	Fed. R. Evid. 401, 402, 403, 404

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	\$1.2Billion Financial Penalty	
214.	Official Justice Department Statement of Facts regarding Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty	Fed. R. Evid. 401, 402, 403, 404
215.	Toyota Automotive Safety Manual – Bates number 86845-86892	Fed. R. Evid. 401, 402, 403
216.	Slideshow presentation (first 10 pages) – http://www.sc.toyotafinancial.com/web/tfs/pub/contents/investorRelations/Investor%20Presentation%20April%202013.pdf	Fed. R. Evid. 401, 402, 403, 801, 802, 901
217.	Letter dated June 14, 2010 from Toyota Financial Services regarding amount to be paid to Toyota as a result of the loss of the 4Runner	Fed. R. Evid. 401, 402, 403, 801, 802, 901
218.	Toyota's Annual Report (Form 20-F) for 2010, pursuant to Section 13 of the SEC Act of 1934 (bate-numbers 847962-848163)	Fed. R. Evid. 401, 402, 403
219.	Intentionally Omitted	
220.	Intentionally Omitted	
221.	Intentionally Omitted	
222.	Intentionally Omitted	
223.	Intentionally Omitted	
224.	Intentionally Omitted	
225.	Intentionally Omitted	
226.	Intentionally Omitted	
227.	Intentionally Omitted	
228.	Intentionally Omitted	
229.	NHTSA's 2012 Vehicle Recalls by Manufacturer	Fed. R. Evid. 401, 402, 403, 404, 801, 802, 901
230.	Intentionally Omitted	
231.	Intentionally Omitted	
232.	Intentionally Omitted	
233.	Intentionally Omitted	
234.	Intentionally Omitted	
235.	Intentionally Omitted	
236.	Intentionally Omitted	
237.	Intentionally Omitted	
238.	Intentionally Omitted	
239.	Intentionally Omitted	

Plaintiffs' Exhibit	The Toyota Defendants' Objection
240. Intentionally Omitted	
241. National Transportation Safety Board's Most Wanted List - Mandate Motor Vehicle Collision Avoidance Technologies	
242. Intentionally Omitted	
243. Intentionally Omitted	
244. Photo of rear of Dolphin-Strick trailer - GREENE_002101	
245. Photo of underside of Dolphin-Strick trailer - GREENE_002238	
246. Information from Strick's membership group and NHTSA regarding potential costs and benefits of underride guards	
247. Strick Trailer's February 2, 1998 Testing Report for "16" Weld-on Bumper Gusset"	
248. Department of Public Safety Photos (bates no. Toyota 00007-00080)	Fed. R. Evid. 401, 402, 403
249. WFAA News scene photograph (bates no. Toyota_00131)	Fed. R. Evid. 401, 402, 403, 901
250. Autopsy of Lakeysa Greene	Fed. R. Evid. 401, 402, 403 (photographs)
251. Autopsy of Wyndell Greene, Sr.	Fed. R. Evid. 401, 402, 403 (photographs)
252. Recording of Kaufman County 9-1-1 call:025_2010_05_28_182454699 (confirmed by Plaintiffs' Ex. 3)	Fed. R. Evid. 401, 402, 403
253. Recording of Kaufman County 9-1-1 call:022_2010_05_28_182454261(con firmed by Plaintiffs' Ex. 3)	Fed. R. Evid. 401, 402, 403
254. Recording of Kaufman County 9-1-1 call:005_2010_05_28_183041417(con firmed by Plaintiffs' Ex. 3)	Fed. R. Evid. 401, 402, 403
255. Recording of Kaufman County 9-1-1 call DISPATCHING Elmo Fire and Rescue:023_2010_05_28_182733167(confirmed by Plaintiffs' Ex. 3)	Fed. R. Evid. 401, 402, 403
256. Affidavit of Texas Department of Transportation Crash Report	Fed. R. Evid. 401, 402, 403 (subject to redaction)
257. Affidavit of Billing of Reasonable and Necessary Medical Expenses from UT Southwestern Medical Center (bates no. GREENE_006442-006467)	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
258. Medical Examiner's tagged photographs of Wyndell Greene, Sr. (with private parts redacted) (bates no.	Fed. R. Evid. 401, 402, 403

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	GREENE_006468-006470)	
259.	Medical Expenses from Air Evac Lifeteam to transport Wyndell Greene, Sr. on May 28,2010	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
260.	Affidavit of medical records from Air EvacLifeteam for Wyndell Greene, Sr. on May 28,2010 (bates no. GREENE_000125-000137)	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
261.	Medical Expenses from Centennial MedicalCenter	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
262.	Photos at accident site (bates no. GREENE_000400-000407)	
263.	Dairy entries in Caring Bridge journal (bates no. GREENE_000432-000453)	Fed. R. Evid. 401, 403, 404, 801, 802
264.	Affidavit of Billing of Reasonable and Necessary Medical Expenses from Parkland Hospital (bates no. GREENE_002820-003115)	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
265.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part1 of 8)	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
266.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part2 of 8)	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
267.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part of 8)	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
268.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part4 of 8)	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
269.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part5 of 8)	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
270.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part6 of 8)	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
271.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part7 of 8)	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
272.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part8 of 8)	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)
273.	Summary of Wyndell Greene medical expenses paid by Meridian Resource on behalf of Lakeysha Greene	Fed. R. Evid. 702, 801, 803; Fed. R. Civ. P. 26(a)(2)

Plaintiffs' Exhibit	The Toyota Defendants' Objection
274. ETMC EMS Patient Care Records for Wyndell Greene on May 28, 2010	Fed. R. Evid. 801, 803, 901
275. Dairy entries in Caring Bridge journal (bates no. GREENE_002494-002726)	Fed. R. Evid. 401, 402, 403, 801, 802
276. Lakeysha and Wyndell Greene wedding photo	
277. Photo of Wesleigh Greene at birth	Fed. R. Evid. 401, 402, 403
278. Photo of Wesleigh Greene with her father as he works	Fed. R. Evid. 401, 402, 403
279. Photo of Wesleigh Greene at 1 st birthday party	Fed. R. Evid. 401, 402, 403
280. Photo of Wyndell Greene, Sr. teaching Wesleigh to swim	Fed. R. Evid. 401, 402, 403
281. Wesleigh Greene's writings and drawings to her mother	Fed. R. Evid. 401, 402, 403
282. Wesleigh Greene's writings and drawings to her mother and father	Fed. R. Evid. 401, 402, 403
283. Wyndell Greene, Sr. and Wesleigh Greene at Daughter-Daddy dance	Fed. R. Evid. 401, 402, 403
284. Photo of Wesleigh Greene dressed for birthday party	Fed. R. Evid. 401, 402, 403
285. Photo of Wyndell Greene, II at childbirth	Fed. R. Evid. 401, 402, 403
286. Photo of Wyndell "Kyle" Greene, II	Fed. R. Evid. 401, 402, 403
287. Photo of Wesleigh Greene	Fed. R. Evid. 401, 402, 403
288. Photo of Wesleigh and Kyle Greene	Fed. R. Evid. 401, 402, 403
289. Short video of Wesleigh Greene	Fed. R. Evid. 401, 402, 403
290. Short video of Wyndell Kyle Greene, II	Fed. R. Evid. 401, 402, 403
291. Greene Family Photo	Fed. R. Evid. 401, 402, 403
292. Photo of Wesleigh Greene and teacher	Fed. R. Evid. 401, 402, 403
293. Wesleigh Greene and classmates	Fed. R. Evid. 401, 402, 403
294. Greene Family Photo	Fed. R. Evid. 401, 402, 403
295. Greene Family Photo	Fed. R. Evid. 401, 402, 403
296. Photo of Mrs. Marilyn Hardeman and grandkids	Fed. R. Evid. 401, 402, 403
297. Photo of Mrs. Ollie Greene and Wesleigh	Fed. R. Evid. 401, 402, 403
298. Memorial Service video for Lakeysha, Wesleigh, and Wyndell Greene, II (bates no. GREENE_006435)	Fed. R. Evid. 401, 402, 403, 801, 802
299. Printed Memorial Service Program for Lakeysha, Wesleigh, and Wyndell Greene, II	Fed. R. Evid. 401, 402, 403, 801, 802

Plaintiffs' Exhibit		The Toyota Defendants' Objection
300.	Video portrait of the Greene family (bates no. GREENE_006716)	Fed. R. Evid. 401, 402, 403, 801, 802
301.	Video of balloon send-off for Wesleigh Greene from classmates (bates no. GREENE_000455)	Fed. R. Evid. 401, 402, 403, 801, 802
302.	Funeral expenses for Lakeysha, Wesleigh, and Kyle funeral	Fed. R. Evid. 401, 402, 403, 801, 802
303.	Photo of gravestone for Lakeysha, Kyle and Wesleigh Greene	Fed. R. Evid. 401, 402, 403, 801, 802
304.	Wyndell Greene's funeral program	Fed. R. Evid. 401, 402, 403, 801, 802
305.	Video 1 of interior and exterior of the Greene residence	Fed. R. Evid. 401, 402, 403, 801, 802
306.	Video 2 of interior and exterior of the Greene residence	Fed. R. Evid. 401, 402, 403, 801, 802
307.	Timeline of critical dates	Fed. R. Evid. 401, 402, 403, 801, 802
308.	Dr. Darrell Henderson's Expert Report	Fed. R. Evid. 702, 703, 801, 802
309.	Curriculum Vitae and testimony list for Dr. Darrell Henderson	Fed. R. Evid. 801, 802
310.	Photo1 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403
311.	Photo2 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403
312.	Photo3 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403
313.	Photo4 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403
314.	Photo5 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403
315.	Photo6 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403
316.	Photo7 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403
317.	Photo8 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403
318.	Photo9 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403

Plaintiffs' Exhibit		The Toyota Defendants' Objection
319.	Skin and Burn Illustrations_0001	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
320.	Skin and Burn Illustrations_0002	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
321.	Skin and Burn Illustrations_0003	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
322.	Skin and Burn Illustrations_0004	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
323.	Intentionally Omitted	
324.	Intentionally Omitted	
325.	Expert report of Dr. Trudi Zaplac	Fed. R. Evid. 401, 402, 403, 702, 703, 801, 802
326.	Curriculum Vitae of Dr. Trudi Zaplac	Fed. R. Evid. 801, 802
327.	Expert report of Dr. Stan Smith	Fed. R. Evid. 401, 402, 403, 702, 703, 801, 802
328.	Curriculum Vitae of Dr. Stan Smith and list of cases	Fed. R. Evid. 801, 802
329.	Wyndell and Lakeysha Greene Tax Returns 2005-2010	Fed. R. Evid. 401, 402, 403, 801, 802, 901
330.	Wyndell Greene payroll records - ACCENTURE, LLP EMPLOYMENT AND PAYROLL RECORDS VOL. 1 OF 2	Fed. R. Evid. 401, 402, 403, 801, 802, 901
331.	Wyndell Greene payroll records - ACCENTURE, LLP EMPLOYMENT AND PAYROLL RECORDS VOL. 2 OF 2	Fed. R. Evid. 401, 402, 403, 801, 802, 901
332.	Wyndell Greene payroll records - Merrill Lynch	Fed. R. Evid. 401, 402, 403, 801, 802, 901
333.	Lakeysha Greene payroll records – Accenture, Vol 1 of 3	Fed. R. Evid. 401, 402, 403, 801, 802, 901
334.	Lakeysha Greene payroll records – Accenture, Vol 2 of 3	Fed. R. Evid. 401, 402, 403, 801, 802, 901
335.	Lakeysha Greene payroll records – Accenture, Vol 3 of 3	Fed. R. Evid. 401, 402, 403, 801, 802, 901
336.	Lakeysha Greene payroll records - PepsiCo	Fed. R. Evid. 401, 402, 403, 801, 802, 901
337.	Expert report of Jeff Vick	Fed. R. Evid. 702, 703, 801, 802
338.	Curriculum Vitae of Jeff Vick	Fed. R. Evid. 801, 802
339.	On-Site Photo DSC07094	Fed. R. Civ. P. 26(a)(2)
340.	On-Site Photo DSC07096	Fed. R. Civ. P. 26(a)(2)
341.	On-Site Photos DSC07102 and DSC07123	Fed. R. Civ. P. 26(a)(2)
342.	On-Site Photos DSC07104 and DSC07128	Fed. R. Civ. P. 26(a)(2)
343.	On-Site Photo DSC07105 and DSC07129	Fed. R. Civ. P. 26(a)(2)
344.	On-Site Photo DSC07106 and DSC 07130	Fed. R. Civ. P. 26(a)(2)
345.	On-Site Photo DSC07107 and	Fed. R. Civ. P. 26(a)(2)

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	DSC07136	
346.	On-Site Photo DSC07111	Fed. R. Civ. P. 26(a)(2)
347.	On-Site Photo DSC07114	Fed. R. Civ. P. 26(a)(2)
348.	On-Site Photo DSC07116	Fed. R. Civ. P. 26(a)(2)
349.	On-Site Photo DSC07118	Fed. R. Civ. P. 26(a)(2)
350.	On-Site Photo DSC07122	Fed. R. Civ. P. 26(a)(2)
351.	On-Site Aerial Photo MG_6717_4000	Fed. R. Civ. P. 26(a)(2)
352.	On-Site Photo of accident fire	Fed. R. Evid. 401, 402, 403
353.	On-Site Photo1 of vehicles at rest	Fed. R. Evid. 401, 402, 403
354.	On-Site Photo2 of vehicles at rest	Fed. R. Evid. 401, 402, 403
355.	On-Site Photo3 of vehicles at rest	Fed. R. Evid. 401, 402, 403
356.	On-Site Photo4 of vehicles at rest	Fed. R. Evid. 401, 402, 403
357.	On-Site Photo5 of vehicles at rest	Fed. R. Evid. 401, 402, 403
358.	On-Site Photo6 of vehicles at rest	Fed. R. Evid. 401, 402, 403
359.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01038	
360.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01039	
361.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01042	
362.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01043	
363.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01045	
364.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01046	
365.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01047	
366.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01051	
367.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01053	
368.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01055	

Plaintiffs' Exhibit	The Toyota Defendants' Objection
369. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01056	
370. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01057	
371. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01059	
372. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01060	
373. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01063	
374. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01064	
375. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01065	
376. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01068	
377. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01069	
378. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01070	
379. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01072	
380. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01073	
381. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01074	
382. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01075	
383. Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01076	

Plaintiffs' Exhibit		The Toyota Defendants' Objection
384.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01077	
385.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01083	
386.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01084	
387.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01099	
388.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01101	
389.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01102	
390.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01103	
391.	Toyota 4Runner Photo DSC06488	Fed. R. Civ. P. 26(a)(2)
392.	Toyota 4Runner Photo DSC06489	Fed. R. Civ. P. 26(a)(2)
393.	Toyota 4Runner Photo DSC07419	Fed. R. Civ. P. 26(a)(2)
394.	Toyota 4Runner Photo DSC07420	Fed. R. Civ. P. 26(a)(2)
395.	Toyota 4Runner Photo DSC07421	Fed. R. Civ. P. 26(a)(2)
396.	Toyota 4Runner Photo DSC07422	Fed. R. Civ. P. 26(a)(2)
397.	Toyota 4Runner Photo DSC07423	Fed. R. Civ. P. 26(a)(2)
398.	Toyota 4Runner Photo DSC07424	Fed. R. Civ. P. 26(a)(2)
399.	Toyota 4Runner Photo DSC07426	Fed. R. Civ. P. 26(a)(2)
400.	Toyota 4Runner Photo DSC07427	Fed. R. Civ. P. 26(a)(2)
401.	Toyota 4Runner Photo DSC07428	Fed. R. Civ. P. 26(a)(2)
402.	Toyota 4Runner Photo DSC07434	Fed. R. Civ. P. 26(a)(2)
403.	Toyota 4Runner Photo DSC07435	Fed. R. Civ. P. 26(a)(2)
404.	Toyota 4Runner Photo DSC07436	Fed. R. Civ. P. 26(a)(2)
405.	Toyota 4Runner Photo DSC07437	Fed. R. Civ. P. 26(a)(2)
406.	Toyota 4Runner Photo DSC07438	Fed. R. Civ. P. 26(a)(2)
407.	Toyota 4Runner Photo DSC07456	Fed. R. Civ. P. 26(a)(2)
408.	Toyota 4Runner Photo DSC07457	Fed. R. Civ. P. 26(a)(2)
409.	Toyota Corolla Photo DSC07468	Fed. R. Civ. P. 26(a)(2)
410.	Toyota 4Runner Photo DSC07470	Fed. R. Civ. P. 26(a)(2)
411.	Toyota 4Runner Photo DSC07634	Fed. R. Civ. P. 26(a)(2)
412.	Toyota Corolla Photo DSC07550	Fed. R. Civ. P. 26(a)(2)
413.	Toyota Corolla Photo DSC07551	Fed. R. Civ. P. 26(a)(2)

Plaintiffs' Exhibit		The Toyota Defendants' Objection
414.	Toyota Corolla Photo DSC07552	Fed. R. Civ. P. 26(a)(2)
415.	Toyota Corolla Photo DSC07553	Fed. R. Civ. P. 26(a)(2)
416.	Toyota Corolla Photo DSC07554	Fed. R. Civ. P. 26(a)(2)
417.	Toyota Corolla Photo DSC07562	Fed. R. Civ. P. 26(a)(2)
418.	Toyota Corolla Photo DSC07568	Fed. R. Civ. P. 26(a)(2)
419.	Toyota Corolla Photo DSC07583	Fed. R. Civ. P. 26(a)(2)
420.	Toyota Corolla Photo DSC07586	Fed. R. Civ. P. 26(a)(2)
421.	Toyota Corolla Photo DSC07595	Fed. R. Civ. P. 26(a)(2)
422.	Toyota Corolla Photo DSC07597	Fed. R. Civ. P. 26(a)(2)
423.	Toyota Corolla Photo DSC07604	Fed. R. Civ. P. 26(a)(2)
424.	Toyota Corolla Photo DSC07611	Fed. R. Civ. P. 26(a)(2)
425.	Toyota Corolla Photo DSC07655	Fed. R. Civ. P. 26(a)(2)
426.	Toyota Corolla Photo DSC07656	Fed. R. Civ. P. 26(a)(2)
427.	Toyota Corolla Photo DSC07662	Fed. R. Civ. P. 26(a)(2)
428.	Toyota Corolla Photo DSC07663	Fed. R. Civ. P. 26(a)(2)
429.	Volvo VN Tractor Photo DSC07261	Fed. R. Civ. P. 26(a)(2)
430.	Volvo VN Tractor Photo DSC07263	Fed. R. Civ. P. 26(a)(2)
431.	Volvo VN Tractor Photo DSC07264	Fed. R. Civ. P. 26(a)(2)
432.	Volvo VN Tractor Photo DSC07266	Fed. R. Civ. P. 26(a)(2)
433.	Volvo VN Tractor Photo DSC07357	Fed. R. Civ. P. 26(a)(2)
434.	Volvo VN Tractor Photo DSC07358	Fed. R. Civ. P. 26(a)(2)
435.	Volvo VN Tractor Photo DSC07360	Fed. R. Civ. P. 26(a)(2)
436.	Volvo VN Tractor Photo DSC07381	Fed. R. Civ. P. 26(a)(2)
437.	Two photos of Volvo VN tractor at tow yard (bates no. GREENE_006505-06)	
438.	Photo of Fayard Freightliner tractor (bates no. GREENE_001123)	
439.	Photo of Fayard Freightliner tractor (bates no. GREENE_001124)	
440.	Photo of Fayard Freightliner tractor (bates no. GREENE_001213)	
441.	Photo of Fayard Freightliner tractor (bates no. GREENE_001224)	
442.	Photo of Fayard Freightliner tractor (bates no. GREENE_001226)	
443.	Photo of Fayard Freightliner tractor (bates no. GREENE_001231)	
444.	Photo of Fayard Freightliner tractor (bates no. GREENE_001232)	
445.	Photo of Fayard Freightliner tractor (bates no. GREENE_001233)	
446.	Photo of Fayard Freightliner tractor (bates no. GREENE_001236)	

Plaintiffs' Exhibit		The Toyota Defendants' Objection
447.	Photo of Fayard Freightliner tractor (bates no. GREENE_001240)	
448.	Photo of Fayard Freightliner tractor (bates no. GREENE_001242)	
449.	Photo of Fayard Freightliner tractor (bates no. GREENE_001243)	
450.	Photo of Fayard Freightliner tractor (bates no. GREENE_001245)	
451.	Photo of Fayard Freightliner tractor (bates no. GREENE_001246)	
452.	Photo of inspection certification from Fayard Freightliner tractor (bates no. GREENE_001273)	
453.	Photo of inspection certification from Fayard Freightliner tractor (bates no. GREENE_001274)	
454.	VinLink VIN information for Toyota 4Runner	
455.	VinLink VIN information for Toyota Corolla	
456.	2006 TOYOTA COROLLA 4 DOOR SEDAN AutoStats	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
457.	2010 TOYOTA 4RUNNER 4 DOOR 4X2UTILITY AutoStats	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
458.	StifCalc Rear Impact Test Summary Report	Fed. R. Evid. 401, 402, 702, 703; Fed. R. Civ. P. 26(a)(2)
459.	StifCalc Rear Impact Test Summary Report- Utility vehicles	Fed. R. Evid. 401, 402, 702, 703; Fed. R. Civ. P. 26(a)(2)
460.	Equations and Calculations from Jeff Vick	Fed. R. Civ. P. 26(a)(2)
461.	Volvo Point of Perception - diagram	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
462.	Volvo Braking Begins - diagram	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
463.	Volvo 4 Runner Impact - diagram	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
464.	4 Runner Corolla Impact - diagram	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
465.	Volvo 4 Runner Corolla impact - diagram	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
466.	4 Runner Volvo Separation - diagram	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
467.	4 Runner Strick Trailer Impact - diagram	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
468.	Strick Trailer Impact - diagram	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
469.	Tool Box Impact - diagram	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
470.	Vehicle Final Rest Position - diagram	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)
471.	Texas Dept. of Public Safety - Highway Patrol Officer Measurements	Fed. R. Evid. 702, 703; Fed. R. Civ. P. 26(a)(2)

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	"Officer measurements"	
472.	Friedman Research Expert Report - Toyota	Fed. R. Evid. 702, 703, 801, 802
473.	Intentionally Omitted "Friedman Research Expert Report – Volvo"	Fed. R. Evid. 702, 703, 801, 802
474.	Friedman Research Expert Report - Strick	Fed. R. Evid. 702, 703, 801, 802
475.	Friedman Research Expert Report – Fayard and Dolphin	Fed. R. Evid. 702, 703, 801, 802
476.	Curriculum Vitae of Keith Friedman	Fed. R. Evid. 801, 802
477.	Curriculum Vitae of Dr. R. Rhodes Stephenson	Fed. R. Evid. 801, 802
478.	Fire bibliography – marked as Exhibit 6 to Dr. Stephenson deposition	Fed. R. Evid. 801, 802; Fed. R. Civ. P. 26(a)(2)
479.	Supplemental bibliography (marked as Exhibit 7 to Dr. Stephenson's deposition"	Fed. R. Evid. 801, 802; Fed. R. Civ. P. 26(a)(2)
480.	Additional research considered (marked as Exhibit 8 to Dr. Stephenson's deposition)	Fed. R. Evid. 702, 703, 801, 802; Fed. R. Civ. P. 26(a)(2)
481.	Toyota ad directed towards consumers in Mr. Greene's demographic	Fed. R. Evid. 401, 402, 403, 801, 802, 901
482.	The 2010 Toyota 4Runner	
483.	Exemplar of fuel tank from 2010 Toyota 4Runner	Fed. R. Civ. P. 26(a)(2)
484.	Photo of dislodged underride guard (bates no. GREENE_000903)	
485.	Photo of dislodged underride guard (bates no. GREENE_000904)	
486.	2010 Toyota 4Runner LF Quarter Panel Comparison between Replacement and Incident Vehicle	Fed. R. Civ. P. 26(a)(2)
487.	Comparison tank crush - Photo of end of tank to end of shield	Fed. R. Civ. P. 26(a)(2)
488.	Photos of Greene fuel tank damage and impacts from accident	Fed. R. Civ. P. 26(a)(2)
489.	photo of identification of 4Runner roof replacement	Fed. R. Civ. P. 26(a)(2)
490.	photo of impact of area of 4Runner with trailer	Fed. R. Civ. P. 26(a)(2)
491.	Photos of underride guard at accident scene	Fed. R. Civ. P. 26(a)(2)
492.	Photo of Greene vehicle at accident scene	Fed. R. Civ. P. 26(a)(2)

Plaintiffs' Exhibit		The Toyota Defendants' Objection
493.	Photos of examples of underride mountings	Fed. R. Civ. P. 26(a)(2)
494.	Photos of example in use underride guard	Fed. R. Civ. P. 26(a)(2)
495.	Repair quote of accident trailer arranged by Fayard	
496.	Bates# Dolphin-0320 - Annual Vehicle Inspection Report for Dolphin Line Vehicle dated 5-6-2009	
497.	Photos of underride guards that Fayard installed on the Strick trailer	
498.	Violations discovered by TXPDS Commercial Vehicle Enforcement (TX10440EAQ01, CD#0798253, 5/28/2010)	
499.	Documents included with purchase of Strick authorized parts - no instructions	
500.	Photo of Strick part, with label	
501.	Photo of Strick underride guard as received	
502.	Photo of Strick underride guard test	
503.	Underride guard P3 test results	
504.	Photo illustrations of underride guard designs that are welded to cross tube	
505.	Comparison illustrations of underride guards	
506.	Illustration of Strick tested version of underride guard had bolts on the top bracket	
507.	Document - Strick bill of materials that proves they knew trailer was for Dolphin Line (customer)	
508.	Photos of scratch marks on incident Toyota 4Runner on pavement and partial shield	Fed. R. Civ. P. 26(a)(2)
509.	Photos of Volvo front end and flexible bumper fascia that fell off	
510.	Figure - Comparison of FMVSS Stopping Distance Requirements from 60 mph	
511.	Intentionally Omitted	
512.	Excerpt of FE modeling from Toyota Bates 754674-754682	Fed. R. Evid. 401, 402, 403

Plaintiffs' Exhibit	The Toyota Defendants' Objection
513. Excerpt of FE modeling from Toyota Bates 754683-754688	Fed. R. Evid. 401, 402, 403
514. Excerpt of FE modeling from Toyota Bates 754689-754697	Fed. R. Evid. 401, 402, 403
515. Passive Safety - Finite Element Modeling	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
516. Excerpt of FE modeling of Toyota partial body	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
517. Excerpt of FE modeling of Toyota 4Runner	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
518. 2010 vs 2014 Toyota 4Runner rear portion comparison	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
519. Photo of 2010 Toyota 4Runner fuel tank distance to rear axle	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
520. Comparison illustrations 2010 Toyota 4Runner with fuel tank	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
521. Toyota frame, tank, body deformation illustration	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
522. 2010 Toyota 4Runner fuel tank with labels and test results	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
523. Photo - side view of driver rear frame - incident 2010 Toyota 4Runner	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
524. Photo from Toyota Rav4	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
525. Alternative design of fuel tank placement	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
526. Alternative frame design and fuel tank placement	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
527. Check valve illustrations	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
528. Illustration of fuel tanks Toyota vehicles -1994 4Runner, 2008 Rav4, 2008 Sequoia	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
529. Illustration of fuel tank - 2006 Toyota 4Runner	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
530. Test Results and comparison of 2010 Toyota 4Runner with other vehicle fuel system designs	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
531. Exhibit 12 from Keith Friedman Deposition	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
532. Illustrations of leak testing, accident scene information, and vehicle characteristics	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
533. Illustrations related to Strick underride guard, including photos of components and scene photos	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)

Plaintiffs' Exhibit		The Toyota Defendants' Objection
534.	Illustrations of Toyota 4Runner exemplar fuel system components	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
535.	Illustrations of Toyota parts and Strick trailer	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
536.	Illustrations related to Strick underride guard, including subject trailer and installation instructions	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
537.	Illustrations of Strick Toyota and Volvo parts and concepts	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
538.	Illustration of 2003 Strick welded underride guard	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
539.	Illustration of Toyota part and trailer	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
540.	Illustration of Toyota 4Runners	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
541.	Illustration of Toyota parts (fuel tank, tank strap and shield)	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
542.	Illustration of alternative frame designs	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
543.	Illustration of Volvo tractor frame and parts	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
544.	Illustration of accident vehicle parts	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
545.	Illustration of Toyota Fuel Tank Skid Plate Underside Striations	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
546.	Illustration of various fuel tanks	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
547.	Illustration of Toyota shield	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
548.	Illustration of seat belt usage	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
549.	Illustration of accident vehicle fuel tank damage	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
550.	Illustration of accident vehicle damage	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
551.	Illustration of accident vehicle damage (Rear Axle Bracket and Stabilizer Link Impact with Rear of Muffler)	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
552.	Illustration of rear axle forward motion	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
553.	Illustration of strap bending and rear fuel tank deformation	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
554.	Illustration of fuel tank bending and other vehicle damage	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
555.	Visual comparison of 2010 and 2014 4Runners	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
556.	Illustration of locations of fuel tanks by other manufacturers	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
557.	Radar collision mitigation scenarios (Ex. 26 at Friedman Deposition)	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
		Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
558.	Illustration of vehicle damage to	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	4Runner and Strick trailer	
559.	Illustration of replacement Strick underride guards	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
560.	Illustration of vehicle damage, scene, parts	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
561.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
562.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
563.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
564.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
565.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
566.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
567.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
568.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
569.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
570.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
571.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
572.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
573.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
574.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
575.	Demonstrative video – 4Runner component parts	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
576.	Demonstrative video – 4Runner component parts	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
577.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
578.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
579.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
580.	Demonstrative video – Heavy Truck	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P.

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	into 4Runner	26(a)(2)
581.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
582.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
583.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
584.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
585.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
586.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
587.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
588.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
589.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
590.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
591.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
592.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
593.	Demonstrative video – 4Runner component parts	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
594.	Demonstrative video – 4Runner component parts	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
595.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
596.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
597.	Demonstrative video – 4Runner component parts	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
598.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
599.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
600.	Demonstrative video – 4Runner component parts	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
601.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
602.	Demonstrative video – Heavy Truck	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P.

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	into 4Runner	26(a)(2)
603.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
604.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
605.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
606.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
607.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
608.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
609.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
610.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
611.	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
612.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
613.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
614.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
615.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
616.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
617.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
618.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
619.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
620.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
621.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
622.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
623.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
624.	Demonstrative video – 4Runner into	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P.

	Plaintiffs' Exhibit	The Toyota Defendants' Objection
	Strick Trailer	26(a)(2)
625.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
626.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
627.	Demonstrative video – 4Runner fuel system design	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
628.	Demonstrative video – 4Runner fuel system design	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
629.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
630.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
631.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
632.	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
633.	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
634.	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
635.	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
636.	Demonstrative video – psi fill for fuel tank	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
637.	Demonstrative video – fuel tank leak video	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
638.	Demonstrative video – IIHS crash test	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
639.	Demonstrative video – IIHS crash test	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
640.	Friedman/Stephenson Analysis of Evidence Photo 9	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
641.	Friedman/Stephenson Analysis of Evidence Photo 10	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
642.	Friedman/Stephenson Analysis of Evidence Photo 11	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
643.	Friedman/Stephenson Analysis of Evidence Photo 12	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
644.	Friedman/Stephenson Analysis of Evidence Photo 13	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
645.	Friedman/Stephenson Analysis of Evidence Photo 14	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
646.	Friedman/Stephenson Analysis of Evidence Photo 15	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
647.	Friedman/Stephenson Analysis of	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P.

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	Evidence Photo 16	26(a)(2)
648.	Friedman/Stephenson Analysis of Evidence Photo 17	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
649.	Friedman/Stephenson Analysis of Evidence Photo 18	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
650.	Friedman/Stephenson Analysis of Evidence Photo 19	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
651.	Friedman/Stephenson Analysis of Evidence Photo 20	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
652.	Friedman/Stephenson Analysis of Evidence Photo 21	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
653.	Friedman/Stephenson Analysis of Evidence Photo 22	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
654.	Friedman/Stephenson Analysis of Evidence Photo 23	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
655.	Friedman/Stephenson Analysis of Evidence Photo 24	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
656.	Friedman/Stephenson Analysis of Evidence Photo 25	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
657.	Friedman/Stephenson Analysis of Evidence Photo 26	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
658.	Friedman/Stephenson Analysis of Evidence Photo 27	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
659.	Friedman/Stephenson Analysis of Evidence Photo 28	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
660.	Friedman/Stephenson Analysis of Evidence Photo 29	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
661.	Friedman/Stephenson Analysis of Evidence Photo 30	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
662.	Friedman/Stephenson Analysis of Evidence Photo 31	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
663.	Friedman/Stephenson Analysis of Evidence Photo 32	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
664.	Friedman/Stephenson Analysis of Evidence Photo 33	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
665.	Friedman/Stephenson Analysis of Evidence Photo 34	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
666.	Friedman/Stephenson Analysis of Evidence Photo 35	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
667.	Friedman/Stephenson Analysis of Evidence Photo 36	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
668.	Friedman/Stephenson Analysis of Evidence Photo 37	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
669.	Friedman/Stephenson Analysis of	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P.

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	Evidence Photo 38	26(a)(2)
670.	Friedman/Stephenson Analysis of Evidence Photo 39	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
671.	Friedman/Stephenson Analysis of Evidence Photo 40	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
672.	Friedman/Stephenson Analysis of Evidence Photo 41	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
673.	Friedman/Stephenson Analysis of Evidence Photo 42	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
674.	Friedman/Stephenson Analysis of Evidence Photo 43	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
675.	Friedman/Stephenson Analysis of Evidence Photo 44	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
676.	Friedman/Stephenson Analysis of Evidence Photo 45	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
677.	Friedman/Stephenson Analysis of Evidence Photo 46	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
678.	Friedman/Stephenson Analysis of Evidence Photo 47	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
679.	Friedman/Stephenson Analysis of Evidence Photo 48	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
680.	Friedman/Stephenson Analysis of Evidence Photo 49	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
681.	Friedman/Stephenson Analysis of Evidence Photo 50	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
682.	Friedman/Stephenson Analysis of Evidence Photo 51	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
683.	Friedman/Stephenson Analysis of Evidence Photo 52	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
684.	Friedman/Stephenson Analysis of Evidence Photo 53	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
685.	Friedman/Stephenson Analysis of Evidence Photo 54	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
686.	Friedman/Stephenson Analysis of Evidence Photo 55	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
687.	Friedman/Stephenson Analysis of Evidence Photo 56	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
688.	Friedman/Stephenson Analysis of Evidence Photo 57	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
689.	Friedman/Stephenson Analysis of Evidence Photo 58	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
690.	Friedman/Stephenson Analysis of Evidence Photo 59	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
691.	Friedman/Stephenson Analysis of	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P.

Plaintiffs' Exhibit		The Toyota Defendants' Objection
	Evidence Photo 60	26(a)(2)
692.	Friedman/Stephenson Analysis of Evidence Photo 61	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
693.	Friedman/Stephenson Analysis of Evidence Photo 62	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
694.	Friedman/Stephenson Analysis of Evidence Photo 63	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
695.	Friedman/Stephenson Analysis of Evidence Photo 64	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
696.	Friedman/Stephenson Analysis of Evidence Photo 1	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
697.	Friedman/Stephenson Analysis of Evidence Photo 2	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
698.	Friedman/Stephenson Analysis of Evidence Photo 3	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
699.	Friedman/Stephenson Analysis of Evidence Photo 4	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
700.	Friedman/Stephenson Analysis of Evidence Photo 5	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
701.	Friedman/Stephenson Analysis of Evidence Photo 6	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
702.	Friedman/Stephenson Analysis of Evidence Photo 7	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
703.	Friedman/Stephenson Analysis of Evidence Photo 8	Fed. R. Evid. 401, 402, 403, 702; Fed. R. Civ. P. 26(a)(2)
704.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
705.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
706.	Illustration of Toyota parts	Fed. R. Evid. 401, 402, 403, 702 ; Fed. R. Civ. P. 26(a)(2)
707.	Photos of cab interior of Daniel Sprinkle's tractor	
708.	Cost information for Toyota fuel tank protectors if purchased from parts seller	Fed. R. Evid. 401, 402, 403
709.	February 28, 2011 letter from the Insurance Institute for Highway Safety to National Highway Traffic Safety Administration: Petition for Rulemaking; 49 CFR Part 571 Federal Motor Vehicle Safety Standards; Rear Impact Guards; Rear Impact Protection	Fed. R. Evid. 801, 802, 901

	Plaintiffs' Exhibit	The Toyota Defendants' Objection
710.	Insurance Institute for Highway Safety News Release: Underride guards on big rigs often fail in crashes; Institute petitions government for new standard	Fed. R. Evid. 801, 802, 901
711.	Insurance Institute for Highway Safety Status Report, Bulletin Vol. 46, No. 2, March 1, 2011: Underride Crashes	Fed. R. Evid. 801, 802, 901
712.	Insurance Institute for Highway Safety Status Report, Bulletin Vol. 47, No. 5, July 3, 2012: Special Issue: Crash Avoidance	Fed. R. Evid. 801, 802, 901
713.	Insurance Institute for Highway Safety Bulletin Vol. 29, No. 5, April 2012: Volvo collision avoidance features: initial results	Fed. R. Evid. 801, 802, 901
714.	Expert report of Dr. Joseph Burton	Fed. R. Evid. 801, 802
715.	Curriculum Vitae of Dr. Joseph Burton	Fed. R. Evid. 801, 802
716.	Collection of Dr. Burton's Vehicle Inspection Photographs	Fed. R. Evid. 401, 402, 403; Fed. R. Civ. P. 26(a)(2)
717.	Dr. Burton Rear Impact Case list	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
718.	Dr. Burton Underride Case list	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
719.	Dr. Burton Fuel-fed Fires Cases list	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
720.	Dr. Burton Lateral Impact Cases list	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
721.	Dr. Burton Rear Impact Bibliography	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
722.	Dr. Burton Fire / CO Bibliography	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
723.	Dr. Burton Side Impact Bibliography	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
724.	Dr. Burton Underride Bibliography	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
725.	Dr. Burton Head Injury Bibliography	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
726.	Dr. Burton Human Tolerance Bibliography	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
727.	Dr. Burton Pain & Suffering Bibliography	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
728.	Dr. Burton Diagnosis of Seat Belt Usage Bibliography	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
729.	Dr. Burton Seat Belt Bibliography	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ.

Plaintiffs' Exhibit		The Toyota Defendants' Objection
		P. 26(a)(2)
730.	Dr. Burton Forensic Textbook Bibliography	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
731.	Papers authored by Dr. Burton	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
732.	Dr. Burton's 4Runner inspection notes	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
733.	Timeline of critical dates	Fed. R. Evid. 401, 402, 403, 801, 802; Fed. R. Civ. P. 26(a)(2)
734.	Frank Katz email regarding Canadian bumper and cost per unit	
735.	Frank Katz email regarding Canadian bumper	
736.	Frank Katz email with TTMA information	
737.	email regarding TTMA conference on Lufkin verdict	

WHEREFORE, PREMISES CONSIDERED, the Toyota Defendants respectfully ask this Court to sustain their Objections to the Plaintiffs' Exhibit List and that the Court grant such other relief to which they may show themselves to be justly entitled.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all known counsel of record in this cause in accordance with the Federal Rules of Civil Procedure on this 18th day of June, 2014.

/S/ DAVID P. STONE